

MOTION "GRANTED" THIS 5th DAY OF
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND, 2005.

**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,**

Plaintiff,

and

KATHY KOCH,

Intervenor/Plaintiff,

v.

LA WEIGHT LOSS CENTERS, INC.,

Defendant.

WILLIAM D. QUARLES, JR.
UNITED STATES DISTRICT JUDGE

CASE NO.: WDQ 02-CV-648

JURY DEMANDED

JOINT MOTION TO EXTEND DISCOVERY AND MODIFY SCHEDULE

Pursuant to the Federal Rules of Civil Procedure, Rule 105 of the Local Rules of the United States District Court for the District of Maryland and the Court's May 25, 2004, Order Regarding Bifurcation and Scheduling (the "Order"), plaintiff EEOC and defendant LA Weight Loss Centers, Inc. (the "Parties" respectfully request that the Court enter an order extending the non-expert discovery period in this matter by five (5) months and adjusting all other dates set forth in the Order. Intervenor-plaintiff Kathy C. Koch neither joins nor opposes the Parties' request.

In support of this Motion, the Parties represent that they have diligently engaged in extensive discovery. To date, the Parties have exchanged in excess of 300,000 documents and taken over 45 depositions, including more than 20 claimants. Notwithstanding the Parties' efforts, they will not be able to complete discovery by the current February 25, 2005, deadline. The following factors give rise to this Motion: (1) the complexity of the factual and logistical

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U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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